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RICHARD W. WHITING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MEJ

UNITED STATES OF AMERICA and  
CHUNG NGO, Revenue Agent,

Petitioners,

v.

TAMARA L. HEFFELFINGER,

Respondent.

CV 10 3817  
No. [Proposed]  
ORDER TO SHOW CAUSE RE  
ENFORCEMENT OF INTERNAL  
REVENUE SERVICE SUMMONS

Good cause having been shown by the petitioners upon its petition filed in the  
above-entitled proceeding on August 26, 2010, it is hereby:

**ORDERED** that respondent TAMARA L. HEFFELFINGER appear before this  
Court on the 2nd day of December, 2010, at 10a.m., in Courtroom No. B, 15th Floor,  
United States District Court, 450 Golden Gate Avenue, San Francisco, California, and  
then and there show cause, if any, why respondent should not be compelled to appear and  
provide documents and testimony as required by the summons heretofore served upon  
respondent as alleged and set forth in particular in said petition; and it is further

**ORDERED** that a copy of this Order to Show Cause, together with a copy of the  
aforesaid petition, be served upon said respondent in accordance with Rule 4 of the  
Federal Rules of Civil Procedure at least thirty-five (35) days before the return date of

1 this Order above specified; and it is further

2       **ORDERED** that within twenty-one (21) days before the return date of this Order,  
3 respondent may file and serve a written response to the petition, supported by appropriate  
4 affidavit(s) or declaration(s) in conformance with 28 U.S.C. § 1746, as well as any  
5 motion respondent desires to make, that the petitioner may file and serve a written reply  
6 to such response, if any, within fourteen (14) days before the return date of this Order;  
7 that all motions and issues raised by the pleadings will be considered on the return date of  
8 this Order, and only those issues raised by motion or brought into controversy by the  
9 responsive pleadings and supported by affidavit(s) or declaration(s) will be considered at  
10 the return of this Order, and any uncontested allegation in the petition will be considered  
11 admitted.

12       **ORDERED** this 7th day of September, 2010, at \_\_\_\_\_,  
13 California.

